

October 2002

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission (FCC)
445 12th Street SW, TW-A325
Washington, DC 20554

Re: CG Docket # 02-311- Biennial Review 2002

I am currently retired, but I am a Deaf consumer, was a provider of services to the deaf, and am the father of a Deaf son. I am currently chairperson of the PA Telecommunications Relay Services and can't imagine life without access to the world of telecommunications. I am against any revisions or repeal of the rules listed below FCC should not consider revision or repeal of these critical rules. I do not trust the business world to make their products accessible to those with disabilities, and regulations from government entities such as yours are critical to leveling the playing field for people with disabilities. Although this procedural review is routine, please support these critical rules, or even strengthen them.

Part 1 – Practice and Procedure – Establishes general practice requirements. (Subpart E – Informal Complaints.) [Informal Complaint mechanisms are critical to allow consumers who are not lawyers nor experienced in formal protocol to submit comments.]

Part 6 – Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities – Obligations of manufacturers and service providers concerning accessibility to telecommunications service and equipment. [Not only should these rules be left intact, but better enforcement is needed. We are not seeing enough change for the better yet.]

Part 7 – Access to Voicemail and Interactive Menu Services and Equipment by People with Disabilities – Obligations of providers of voicemail and interactive menu services as well as manufacturers of telecommunications equipment which performs a voicemail or interactive menu function. [This is critical in our day of automated access.]

Part 64 – Miscellaneous Rules Relating to Common Carriers –Subpart F (Telecommunications Relay Services). [If anything these rules need strengthening to bring us closer to functional equivalence. TRS provisions are a basic right under Title IV of the Americans with Disabilities Act.]

Part 68 – Connection of Terminal Equipment to the Telephone Network –Concerning the rules in this part relating to hearing aid compatibility. [Considering the huge number of individuals in America that wear hearing aids, it is inappropriate to remove this provision. It should be expanded to cover wireless access.]

In closing, the FCC should leave the disability related telecommunications/technology regulations fully intact. They are needed to protect consumer rights and opportunity to access our telecommunications network.

Sincerely,

Lawrence J. Brick